

Message

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**From:** Vozar, Shaun [Shaun.Vozar@AlleghenyCounty.US]  
**Sent:** 8/9/2021 2:22:18 PM  
**To:** Leon-Guerrero, Tim [Leon-Guerrero.Tim@epa.gov]  
**CC:** Maranche, Jason [Jason.Maranche@AlleghenyCounty.US]  
**Subject:** RE: Invenergy AEC Response to Comments  
**Attachments:** AMP501\_1949672-0.xlsx; aermod.inp; N\_NH1014\_BPIP\_02\_32.PLT; N\_NH1014\_BPIP\_02\_37.mdc

Tim,

My apologies for the oversight on my part. I do see the receptor 596,941.63 ; 4,460,887.00 had an exceedance of the 1-Hr NO<sub>2</sub> Standard of 189.22192. After speaking with Jason, I decided to redo the background NO<sub>2</sub> analysis with data from the Charleroi monitor (42-125-0005) using 2015-2017 data instead of the 2012-2014 data that was originally used by the applicant. Attached is the updated background values in an excel spreadsheet.

I then reran the model using the updated background numbers and the new AERMET data with Adjust u\*. Attached aermod.inp file. The new max receptor 8<sup>th</sup> rank is 187.00519, at the same location 596,941.63 ; 4,460,887.00. This value is under the threshold value of 188 ug/m<sup>3</sup>, so I think ACHD is in the clear. Attached files: plot file and mdc file. I will adjust the response to your comment #6 to reflect that ACHD used options 1 and 2 to get under the 1-HR NO<sub>2</sub> NAAQS.

Our document control manager is out of office until Wednesday, so I won't be able to upload the full files until later this week. If you have any additional comments or concerns please let me know.

Shaun



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**From:** Leon-Guerrero, Tim <Leon-Guerrero.Tim@epa.gov>  
**Sent:** Wednesday, August 4, 2021 7:07 AM  
**To:** Vozar, Shaun <Shaun.Vozar@AlleghenyCounty.US>  
**Cc:** Maranche, Jason <Jason.Maranche@AlleghenyCounty.US>  
**Subject:** Invenergy AEC Response to Comments

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Shaun,

I've read over your response to comments document you sent us for the Invenergy Allegheny Energy Center project. All of the responses appear to be good except for #6 (the 1-hr NO<sub>2</sub> violation). I looked at the AERMOD output files you sent us (in the vozar folder) and I still see 1 modeled 1-hr NO<sub>2</sub> violation. It's just one receptor at the 8<sup>th</sup> rank (your run was 189.22192 ug/m<sup>3</sup>). This is an improvement over the original submission.

Can you look at your output file and confirm what I think I see? The modeled violation doesn't change the application status since AEC's contribution at the violating receptor is below the SIL. It just leaves you with an obligation to address the model violation.

Timothy A. Leon Guerrero  
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